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 Board staff states, "We will add a new provision to the Order to make explicit the Central Coast Water Board's intent that implementation of increasingly more effective management practices in an iterative manner constitutes compliance with Provisions 22 – 23 and Provisions 84-87 of the Agricultural Order" (Section D, pg 24).

"To comply with Provisions 22, 23, and 84-87 of this Order, Dischargers must (1) implement management practices that prevent or reduce discharges of waste that are causing or contributing to exceedances of water quality standards; and (2) to the extent practice effectiveness evaluation or reporting, monitoring data, or inspections indicate that the implemented management practices have not been effective in preventing the discharges from causing or contributing to exceedances of water quality standards, *the Discharger must implement modified management practices*" (emphasis added).

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Recommend considering alternative language or striking

"Keepers" Petition of the Conditional Waiver of Waste Discharge
Requirements Order No. R3-2012-0011 (and MRPs), Petition A-2209(a)

Among the Tier 3 standards proposed by staff, one of the most important was the requirement that Dischargers with High Nitrate Loading Risk farms/ranches meet the nitrate balance ratio targets.

"Keepers" Petition of the Conditional Waiver of Waste Discharge Requirements Order No. R3-2012-0011 (and MRPs), Petition A-2209(a)

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- 1) Require annual reporting of crop need of all growers
- 2) Require balance by Tier 3 growers

Annual Groundwater Monitoring for Tier 3 Growers

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Annual Groundwater Monitoring for Tier 3 Growers participating in Cooperative Groundwater Monitoring Programs

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Therefore:

Clarify in Section A.6 of Part 2 of the Tier 3 MRP that annual groundwater monitoring is required of growers participating in a cooperative groundwater monitoring program.

Support the Board's decision to uphold individual discharge monitoring requirements



This Order regulates <u>individual</u> <u>discharges</u>.

The only way to verify that individual <u>discharges</u> are not causing or contributing to water quality exceedances is to monitor individual <u>discharges</u>.

Support the Board's decision to require monitoring and reporting of tailwater ponds (containment structures)



Support the Board's clarification of minimum requirements for cooperative groundwater monitoring programs.

- Add Annual Testing for Tier 3 growers;
- We look forward to a better experience with a Cooperative.

Thank you!

Are there any questions?